

### **REMARKS**

These remarks and the accompanying amendments are responsive to the Office Action dated April 6, 2007 (hereinafter, the "Office Action"). At the time of the last examination, Claims 1-10 were pending. By this response Claims 8 and 10 are cancelled, leaving only Claims 1-7 and 9 pending. Of these remaining claims, Claims 1, 6, 7 and 9 are independent. Each of the independent claims are amended herein.

Sections 3 and 4 of the Office Action reject Claims 1-5 under 35 U.S.C. 112, second paragraph, as being indefinite. In particular, the Office Action notes that the "first identify information" in line 21 of Claim 1 lacks antecedent basis. Claim 1 is amended herein the phrase "said first identity information" recited in claim 1 with the phrase "said first subscriber identity information", which has proper antecedent basis in the claim. The same term is also amended in the other independent Claims 6, 7 and 9. Accordingly, the rejection should be withdrawn.

Sections 5-11 of the Office Action reject all of the Claims 1-10 under 35 U.S.C. 103(a) as being unpatentable over United States patent number 6,366,777 issued to Uusitalo (the patent hereinafter referred to simply as "Uusitalo") in view of United States patent number 6,799,057 issued to Liverotti (the patent hereinafter referred to as "Liverotti").

The Applicants amend independent Claims 1, 6, 7 and 9 so as to express the technical feature that a mobile terminal transmits, when at least two recording media are detected, first subscriber identity information which has been already registered by the subscriber information management along with (simultaneously) second subscriber identity information which is not yet registered by the subscriber information management to the subscriber information management apparatus (hereinafter referred as feature (A)).

As to the cited reference of Uusitalo, Uusitalo describes that the "problem this invention offers a solution for arises when a single subscriber has two identity modules which he wishes to associate with the same subscriber number" (Col. 4 lines 10-13). Furthermore, "[t]he object of the invention is to provide a method and equipment implementing the method where a single mobile subscriber can have two different SIM cards ... ; the subscriber can be always reached with the same subscriber number;" (Col. 4, lines 33-37). Uusitalo further recites the following:

The invention is based on a mobile telephone network (for instance its home location register HLR) maintaining information that a subscriber identifier (an MSISDN number) is associated with two or more SIM cards, of which one at the most, however, is active at a time. (Usually one of the SIM cards is active, but when an active SIM card is being changed, a temporary situation where none of the SIM cards is active can arise.) When a mobile station which has a SIM card registered as passive performs location updating, the network (for instance the home location register HLR) notices that the MSISDN number is associated with two SIM cards, of which the one that is currently passive is performing location updating. In this case the network deactivates the SIM card used earlier and activates that SIM card which is used for performing the location updating. The operation then continues as normally. (Col. 4, lines 43-58).

Uusitalo further states:

FIG. 4 is a flow diagram showing additional operations of the invention relating to location updating. Receiving an IMSI in connection with location updating involves checking whether other IMSI identifiers are associated with the same subscriber. If yes, then it is checked whether the location updating relates to an IMSI identifier registered as active. If the location updating relates to an IMSI identifier registered as passive, the IMSI used earlier is deactivated and the IMSI associated with the location updating is activated. (Col.5, lines 23-32).

According to these description, Uusitalo discloses that in the mobile telephone network in which a subscriber identifier (an MSISDN number) is associated with two or more SIM cards in the table of the HLR before the location update is performed, one of the SIM cards used for the

performing the location update is activated in response to the location update. In the mobile telephone network of Uusitalo, when the location update is performed the IM8I to be activated is transmitted from a mobile station to the HLR.

However Uusitalo fails to disclose, teach or suggest the above-mentioned feature (A) as recited in the amended claims of the present application.

As to the new cited reference of Liverotti, Liverotti describes "In this frame, it is the main object of the present invention to provide a GSM cellular terminal, which is apt to allow a simultaneous use in transeiving mode of at least two service types associated with respective SIM cards" (Col. 1, lines 32-35). Furthermore, "Advantageously, the GSM cellular terminal according to the present invention allows independent management of two or more SIM cards on one GSM cellular terminal alone. Such a management ... can be a simultaneous one, i.e. calls can be received or made using both or more SIM cards simultaneously" (Col.3, lines 9-15).

However, Liverotti does not describe how location updates regarding with two or more SIM cards are performed.

Therefore, Liverotti also fails to disclose above-mentioned feature (A) recited in the amended claims of the present application.

Therefore, Uusitalo and Liverotti fail to teach or suggest, either singly or in combination, the above-mentioned feature (A) of the independent Claims 1, 6, 7 and 9. Accordingly, the 35 U.S.C. 103(a) rejection should be withdrawn, and further favorable action is respectfully requested.<sup>1</sup>

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<sup>1</sup> Since, even if combined, the references do not teach or suggest at least some of the recited features, it is not necessary at this time to present arguments as to why the combining of the references is not appropriate. Accordingly, the lack of such arguments against combining should not be viewed as acquiescing that the combination is appropriate. The Applications may present arguments against the combination itself at some future time should that become appropriate.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 15<sup>th</sup> day of March, 2007.

Respectfully submitted,

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